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January 26, 2024

Hon. John G. Koeltl  
U.S. District Court - Southern District of New York  
500 Pearl St.  
New York, NY 10007

Re: *U.S. v. Foley, et. al.* 23 cr 664 (JGK)

Dear Judge Koeltl:

I am counsel for Erin Foley, a defendant in the above referenced matter.

Please accept this letter in lieu of a formal motion requesting a modification of Ms. Foley's bond.

A condition of the bond states, "The defendant is to have no contact with witnesses, except in the presence of counsel. Witnesses include present and former employees of all five (5) entities identified in the indictment and present and former clients of Grapevine Professional Services." The bond does permit her to have contact with her brother, and co-defendant, Ted Albin, a former principal of Grapevine, provided they do not discuss the case or facts of the underlying indictment except in the presence of counsel.

Two persons associated with the five entities identified in the indictment are Ms. Foley's sister (Molly Hilerman) and close friend (Audra Kashack). Accordingly, I respectfully request the bond be modified to allow Ms. Foley to have contact with them under the same condition she may have contact with Ted Albin.

I have conferred with the Government and they do not object to this request.

Very truly yours,

/s/

Jeffrey G. Pittell

cc: Rushmi Bhaskaran / David Lewis, AUSA  
Erin Foley

**APPLICATION GRANTED  
SO ORDERED**

1/29/24   
John G. Koeltl, U.S.D.J.